

# **Exhibit 5**

UNITED STATES DISTRICT COURT

No. 032567-NG

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STEPHEN BECKMAN,  
Plaintiff

Vs.  
BULL HN INFORMATION SYSTEMS,  
Defendant

\* \* \* \* \*

DEPOSITION OF *JOHN J. HANNON*, taken on  
behalf of the Defendant, pursuant to the Federal  
Rules of Civil Procedure, before Carol DiFazio,  
CSR: #108293, a Registered Professional Reporter and  
Notary Public in and for the Commonwealth of  
Massachusetts, at the offices of Wilmer Cutler  
Pickering Hale and Dorr LLP, 60 State Street,  
Raymond B. Roberts Conference Room, Boston, MA  
02109, on Thursday, March 24, 2005, commencing at  
10:00 a.m.

APPEARANCES:

NANCIE L. EDGREN, ESQ., of Barron & Stadfeld, PC,  
100 Cambridge Street, Ste. 1310, Boston, MA  
02114, on behalf of the Plaintiff.

JOAN LUKEY and KELLY BLACK-HOLMES, ESQ., of Wilmer  
Cutler Pickering Hale and Dorr LLP, 60 State  
Street, Boston, MA 02109, on behalf of the  
Defendant.

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Hearings ♦ Conferences ♦ Legal Proceedings

1 Q. With regard to the manufacturing  
2 organization, was there a period of time in which  
3 there was significant layoffs?

4 A. There was a period of time where there was  
5 continuing layoffs. They weren't necessarily  
6 significant in terms of numbers, but they were  
7 consistent going forward. I mean you didn't rest  
8 easy when you were there.

9 Q. What was that period?

10 A. I have got to say probably, probably in the  
11 late '80s into the '90s.

12 Q. Did you become aware at any point that Bull  
13 was experiencing financial issues?

14 A. Yes.

15 Q. And when did you become aware of that?

16 A. Probably started in '76, 1976.

17 Q. Were you aware at some point in the 1990s  
18 of particularly serious financial issues?

19 A. Yes.

20 Q. And do you recall when you became aware  
21 that there were particularly significant financial  
22 problems?

23 A. Probably when I went to Lawrence.

1 Q. And how did you become aware that there  
2 were significant financial problems?

3 A. All the indicators were down.

4 Q. The financial indicators?

5 A. Shipments, yes, or shipments are down,  
6 orders are down. And they were changing  
7 philosophies to some extent. For example, they had  
8 a board facility, what they called a board facility  
9 in Brighton that many of our associates worked at.  
10 Lawrence was primarily what you call a systems and  
11 peripheral side of it.

12 So the people in Brighton were getting  
13 into the board manufacture, and it was difficult to  
14 get into it, and it was costing a lot of money, a  
15 lot of investments, and I don't think it ever worked  
16 out.

17 Q. Did you become aware at some point in time  
18 that Bull was going to shift its emphasis from what  
19 it was doing currently to so-called contract  
20 manufacturing for others?

21 A. That's what I mentioned, the board facility  
22 that was contract manufacturing. In Lawrence we had  
23 contract manufacturing. We had a cable facility

1     that we were building cables for other people. The  
2     business was changing. It was getting away from the  
3     systems.

4           Q.     And this contract manufacturing was  
5     actually using Bull's facilities to manufacture  
6     someone else's products; is that correct?

7           A.     Yes.

8           Q.     And do you remember when that was going on?

9           A.     Probably in the early '90s. It's a guess.

10          Q.     Did this transition from manufacturing its  
11     own products to contract manufacturing for others  
12     have any effect on support services such as the  
13     finance group?

14          A.     Yes.

15          Q.     What was the effect on finance?

16          A.     Well, the effect on finance was that the  
17     primary emphasis, for example, when you're not  
18     shipping hardware and computers you don't need  
19     people to maintain the systems, people to maintain  
20     the controls and what have you. Different ball  
21     game.

22          Q.     So you didn't need as many people in  
23     finance?

1 A. Definitely not.

2 Q. Did that lead to layoffs?

3 A. I think so.

4 Q. Were you aware of declining profits at Bull  
5 in that time period?

6 A. Not really.

7 Q. Were you aware of declining revenues?

8 A. Yes.

9 Q. How did you become aware?

10 A. Through the lack of shipments.

11 Q. Was there a publication at Bull called Bull  
12 by the Week?

13 A. I don't know. I don't remember.

14 Q. Do you recall whether you received some  
15 publication on a regular basis from Bull about the  
16 company?

17 A. Now that I saw that, yes, I think there was  
18 some kind of a communications.

19 Q. And do you recall whether that publication  
20 included general information about how things were  
21 going financially for Bull?

22 A. Probably.

23 Q. Did you become aware at some point in the